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February 19, 2008

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: Policy Statement on Voluntary Early Actions to Reduce Greenhouse Gas Emissions

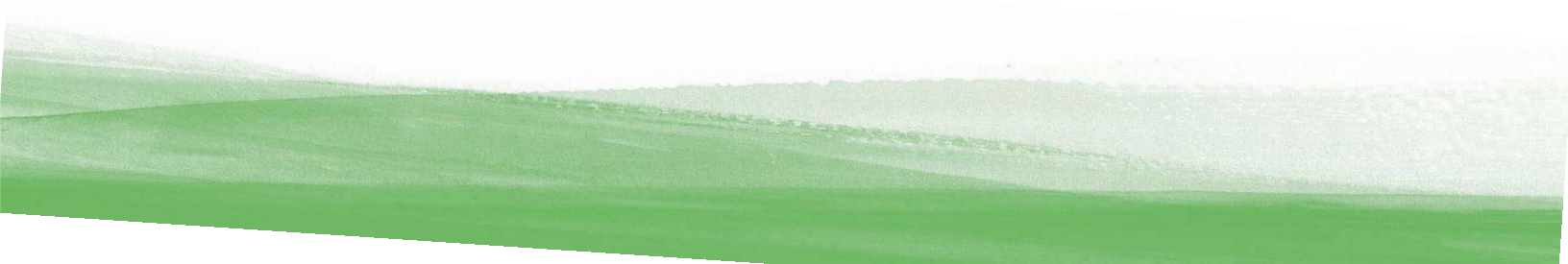
To whom it may concern:

On behalf of Weyerhaeuser Company, I am pleased to submit the following comments on the "Policy Statement on Voluntary Early Actions to Reduce Greenhouse Gas Emissions" draft paper.

Weyerhaeuser believes that entities should be encouraged to take early actions to reduce their GHG emissions and therefore, applauds the staff draft policy statement paper recognizing the importance of awarding credit for early action. Government policies that fail to provide full credit for early actions punish those whose investments generated positive environmental results, and reward those that wait or resist taking action until forced to do so. In effect, policies that preclude benefits accruing to early actors effectively reward recalcitrance, and are not in the public's or the environment's best interests.

In order to award credit for early action we recommend that the Air Resources Board should select an agreed upon starting date (ie: 1990) and until a mandatory program comes into force (January 1, 2012) credit should be awarded for any GHG reduction activity. The entity requesting early action credit would be required to demonstrate the eligibility for the credit, which could be granted to those who can demonstrate a change from the "early" start, or baseline date, and how there was adherence to established GHG measurement and accounting protocols and methodologies. Third party verification of such "claims" would be reasonable.

Once again, we would like to thank the California Air Resources Board for this opportunity to comment on the "Policy Statement on Voluntary Early Actions to Reduce Greenhouse Gas Emissions" draft paper. We look forward to working with the California Air Resources Board in future conversations to help craft a well thought out program which leverages free market economics in an effort to achieve beneficial change with respect to energy security and climate change.





Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Chavez", written over a light gray rectangular background.

Anthony Chavez
Public Affairs Manager
Weyerhaeuser Company

